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6 **UNITED STATES DISTRICT COURT**
7 **WESTERN DISTRICT OF WASHINGTON**
8 **AT SEATTLE**

9 ALEXANDER FLOYD, individually and
10 on behalf of all others similarly situated,

11 Plaintiff,

12 v.

13 INSIGHT GLOBAL, LLC, a Delaware
14 limited liability company; and DOES 1-20,

15 Defendants.

16 NO. 2:23-cv-1680

17 **DECLARATION OF ARIEL ZION IN**
18 **SUPPORT OF REMOVAL**

19 King County Superior Court
20 Case No. 23-2-19335-1 SEA

21 1. My name is Ariel Zion. Pursuant to 28 U.S.C. § 1746, I hereby affirm that I am
22 over 18 years of age, and that I am competent to make the following Declaration, and that I am
23 personally familiar with the information it contains.

24 2. I am over the age of 18 and state the following based on my personal knowledge.

25 3. I am Vice President and Deputy General Counsel at Insight Global. Before joining
26 Insight Global, I was in private practice as a litigator for over ten years.

27 4. Insight Global, LLC is a Delaware limited liability company, with its principal
28 place of business in DeKalb County, Georgia located at 1224 Hammond Drive, Atlanta, Georgia
29 30346.

30 5. Insight Global, LLC's sole member is IG Staffing Holdings, LLC, a limited liability
31 company organized under the laws of the State of Delaware with its headquarters and principal

1 place of business in DeKalb County, Georgia. IG Staffing Holdings, LLC's sole member is IG
 2 Investments Holdings, LLC, a limited liability company organized under the laws of the State of
 3 Delaware with its headquarters and principal place of business in DeKalb County, Georgia. IG
 4 Investments Holdings, LLC's sole member is Igloo Intermediate Holdings, Inc., a limited liability
 5 company organized under the laws of the State of Delaware with is headquarters and principal
 6 place of business in DeKalb County, Georgia. IG Igloo Intermediate Holdings, LLC's sole member
 7 is IG Igloo Holdings, LLC, a limited liability company organized under the laws of the State of
 8 Delaware with its headquarters and principal place of business in DeKalb County, Georgia. IG
 9 Igloo Holdings, LLC's sole member is IG True Grit Parent Holdings, Inc., a corporation organized
 10 under the laws of the State of Delaware with its headquarters and principal place of business in
 11 DeKalb County, Georgia.

12 6. I have been practicing as a licensed attorney since 2007. I have spent over ten years
 13 litigating and billing on an hourly basis. I have managed associates and paralegals on litigation
 14 matters. This also includes responsibility for reviewing client billing. In my experience, the
 15 attorney hours needed to investigate and file a complaint, draft and respond to discovery, take
 16 depositions, and prepare dispositive motions, easily exceeds 100 billable hours. To take a case
 17 through trial, even if only 2 to 3 days, could easily triple those hours just for lead counsel.

18 7. Attached as **Exhibit 1** is a true and correct copy of a declaration filed by Plaintiff's
 19 counsel Timothy Emery in June 2023 in support of an attorneys' fees award in a class action
 20 settlement in a King County Superior Court case. The declaration was obtained via PACER.

21 DECLARED November 2, 2023, at Atlanta, Georgia.



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23 Ariel Zion
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CERTIFICATE OF SERVICE

I hereby certify on the date below written, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system and caused to be served a true and correct copy of same by the method indicated below and addressed as follows:

Timothy W. Emery, WSBA #34078
Patrick B. Reddy, WSBA #34092
Paul Cipriani, WSBA #59991
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Attorneys for Plaintiff

SIGNED at Seattle, Washington this 2nd day of November, 2023.

s/ Todd S. Fairchild
Todd Fairchild